

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LLOYD JONES and BARON SPENCER, on  
Behalf of Themselves and Others Similarly  
Situated,

Plaintiffs,

- against -

CITY OF NEW YORK,

Defendant.

ECF Case  
No. 17 Civ. 7577

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of the Settlement, the Declaration of Debra L. Greenberger dated November 22, 2022 and exhibits thereto, the Declaration of Tiffaney Janowicz dated November 21, 2022 and exhibits thereto, and upon all prior pleadings, Plaintiffs, by their counsel Emery Celli Brinckerhoff Abady Ward & Maazel LLP ("ECBAWM"), Romano & Kuan PLLC, and Kaufman Lieb Lebowitz & Frick ("KLLF"), will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, before the Honorable John G. Koeltl, United States District Judge, for an Order:

- (i) Granting preliminary approval of the settlement with Defendant City of New York dated October 21, 2022;
- (ii) Certifying the settlement class and appointing Plaintiffs as the class representatives and ECBAWM, Romano & Kuan PLLC, and KLLF as class counsel for the settlement class;

- (iii) Approving the form, content and manner of notice to the settlement class and authorizing notice to be distributed in that manner and authorizing the form and content of the claim form;
- (iv) Approving Rust Consulting, Inc. to serve as the class administrator;
- (v) Ordering Defendant to pay the costs of notice and administration to the class administrator pursuant to the terms and conditions set forth in the settlement;
- (vi) Setting a hearing date for consideration of final approval of the settlement, service awards to Plaintiffs Lloyd Jones and Baron Spencer, and class counsel's application for attorneys' fees and expenses; and
- (vii) Granting such other and further relief as may be just and proper.

Dated: November 22, 2022  
New York, New York

EMERY CELLI BRINCKERHOFF  
ABADY WARD & MAAZEL LLP

By:                     /s/                      
Matthew D. Brinckerhoff  
Debra L. Greenberger  
Vasudha Talla  
600 Fifth Avenue, 10<sup>th</sup> Floor  
New York, New York 10020  
212-763-5000

ROMANO & KUAN, PLLC  
Julia P. Kuan  
600 Fifth Avenue, 10th Floor  
New York, New York 10020  
(212) 763-5075

KAUFMAN LIEB LEBOWITZ & FRICK  
David Lebowitz  
10 E. 40th Street, Suite 3307  
New York, NY 10016  
(212) 660-2332  
*Attorneys for Plaintiffs and the putative class*